



REMOTE PATIENT MONITORING

Caroline Reignley, Partner

May 2023

McDermott
Will & Emery

WHAT IS REMOTE PATIENT MONITORING?

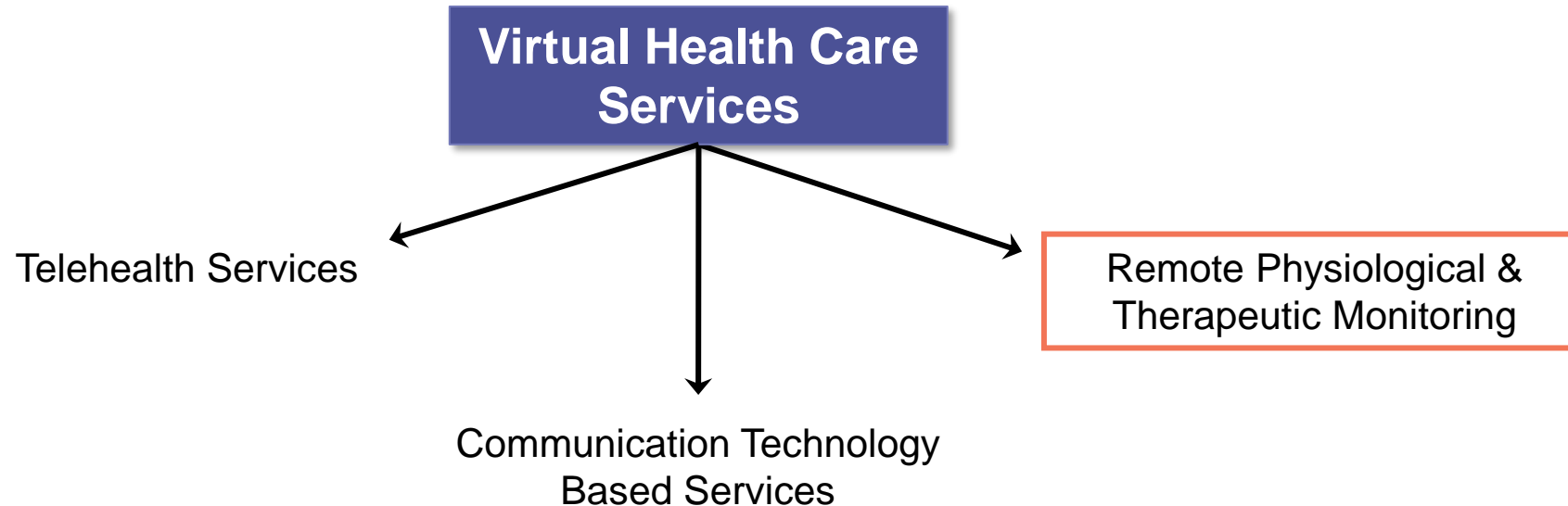
Patient is given a digital monitoring device to use at home

Device transmits patient data to health care providers

Data is used by providers to monitor patient status and guide treatment

Providers can bill patient insurance for monitoring, patient education, and evaluating data

REMOTE MONITORING ≠ TELEHEALTH



“Telehealth” means the exchange of medical information from one site to another through electronic communication to improve a patient’s health. CMS does not consider RPM or RTM to be covered as “telehealth” services.

TWO DISTINCT TYPES OF REMOTE PATIENT MONITORING

Remote Physiological Monitoring

- Monitoring devices that automatically collect **physiological** health data from the point of care, such as vital signs, weight, blood pressure, blood sugar, blood oxygen levels, heart rate, and electrocardiograms
- Used in real time or over longer periods
- **Physicians, PAs, and NPs** review the data, communicate with patients, and make treatment management decisions
- Classified as CPT Evaluation and Management Codes

Remote Therapeutic Monitoring

- Monitoring devices that collect **non-physiological** data either automatically or through patient self-reports, such as pain levels, medication plan compliance, and adherence to physical therapy plans
- Used to monitor patient's response to therapies over time
- **Nurses and physical therapists** review the data, communicate with patients, and make treatment management decisions
- Classified as non-Evaluation and Management Codes

EXAMPLES

Remote Physiological Monitoring

- Pulse oximeters measure oxygen saturation and heart rate for COPD patients
- Real-time glucose level readings for patients with diabetes
- Reports from CPAP machines used by patients with obstructive sleep apnea
- Post-acute care vital symptom monitoring for patients at a high level for hospital readmission

Remote Therapeutic Monitoring

- Patient recovering from knee replacement self-reports completion of exercises at home
- Digital inhaler tracks when asthma patient uses inhaler and sends reminders via app to ensure patient is using inhaler on recommended schedule
- Patient with alcohol addiction self-reports pain levels, relapse incidents, and has access to helpful resources in specialized app

WHAT DEVICES CAN BE USED?

- Devices must meet the FDA definition of a medical device
 - Ex: Continuous glucose monitor, pulse oximeter, heart monitor, CPAP
- Some mobile medical apps are considered medical devices
 - Can include accessories that attach to a smartphone or fitness tracker



BASIC REQUIREMENTS FOR BILLING MEDICARE

- Medicare reimburses for RPM services under the Medicare Physician Fee Schedule.
- Services include:
 - Setting up patient with app/device and teaching patient how to use equipment
 - Provision of device and collection of data
 - Monitoring and analyzing data (billed once every 30 days)
 - Interactive communication with patient to discuss status and treatment progress
- Services can be performed by physicians, nurse practitioners, physician assistants, and others enrolled as Medicare billing providers
 - Other auxiliary personnel (PTs, OTs) can perform some portions of RTM services under general supervision



BILLING FOR REMOTE PHYSIOLOGICAL MONITORING SERVICES

Code	Descriptor	Who can perform the service?	2023 Rate
99453	Remote monitoring - device set-up and patient education on use of equipment	Physician, qualified healthcare professional, clinical staff, or clinical auxiliary staff (under general supervision)	\$ 19.32
99454	Remote monitoring – devices record data or monitor alerts, billed every 30 days		\$ 50.15
99091	Collection and interpretation of patient data, billed every 30 days	Physician or other qualified health care professional	\$ 54.22
99457	Remote monitoring treatment management services, first 20 minutes	Physician, qualified healthcare professional, clinical staff, or clinical auxiliary staff (under general supervision)	\$ 48.80
99458	Remote monitoring treatment management services, each additional 20 minutes		\$ 39.65

BILLING FOR REMOTE THERAPEUTIC MONITORING SERVICES

Code	Descriptor	Who can perform the service?	2023 Rate
98975	Initial set-up and patient education on use of equipment	Clinical auxiliary personnel, including physical therapists, occupational therapists, speech-language pathologists, clinical social workers, and others under general supervision by a physician, physician assistant, nurse practitioner, or other Medicare-enrolled provider	\$ 19.32
98976	Device(s) supply with scheduled (e.g., daily) recording(s) and/or programmed alert(s) transmission to monitor <u>respiratory system</u> , each 30 days		\$ 50.15
98977	Device(s) supply with scheduled (e.g., daily) recording(s) and/or programmed alert(s) transmission to monitor <u>musculoskeletal system</u> , each 30 days		\$ 50.15
98980	Remote therapeutic monitoring <u>treatment management services</u> , physician or other qualified health care professional time in a calendar month requiring at least <u>one interactive communication</u> with the patient/caregiver during the calendar month; first 20 minutes		\$ 49.48
98981	Each additional 20 minutes of treatment management services		\$ 39.65

THANK YOU

This material is for general information purposes only and should not be construed as legal advice or any other advice on any specific facts or circumstances. No one should act or refrain from acting based upon any information herein without seeking professional legal advice. McDermott Will & Emery* (McDermott) makes no warranties, representations, or claims of any kind concerning the content herein. McDermott and the contributing presenters or authors expressly disclaim all liability to any person in respect of the consequences of anything done or not done in reliance upon the use of contents included herein. *For a complete list of McDermott entities visit mwe.com/legalnotices.

©2023 McDermott Will & Emery. All rights reserved. Any use of these materials including reproduction, modification, distribution or republication, without the prior written consent of McDermott is strictly prohibited. This may be considered attorney advertising. Prior results do not guarantee a similar outcome.

